

CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on March 5, 2018, I caused a true copy of the

- *Letter Motion to File a Letter as Amicus Curiae; and*
- *Declaration of Jonathan L. Marcus in Support of Motion for Leave to File Letter as Amicus Curiae with attached Proposed Letter.*

to be served upon the following party in the manner indicated:

By First Class Mail

Patrick K. McDonnell
20 Rawson Place
Staten Island, NY 10314

Dated: Washington, DC
March 5, 2018

/s/Jonathan L. Marcus

Jonathan L. Marcus